

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

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|------------------------|---|-------------------------------|
| LEONARD C. JEFFERSON, | } | |
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| Plaintiff, | } | |
| | } | No. 1:04-cv-44 |
| vs. | } | Chief Magistrate Judge Baxter |
| | } | |
| WILLIAM WOLFE, et al., | } | |
| | } | |
| Defendants. | } | |

DECLARATION OF REVEREND ULRICH H. KLEMM

I, Reverend Ulrich H. Klemm, hereby state that the following information is true and correct to the best of my personal knowledge or information and belief:

1. I am currently employed by the Pennsylvania Department of Corrections as the Administrator of Religion and Volunteer Services in the Treatment Division of the Bureau of Inmate Services, a position that I have held since April 2004.

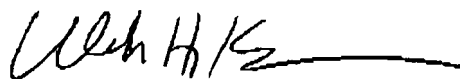
2. As the Administrator of Religion and Inmate Services for the Department of Corrections, I am responsible to direct, plan and organize programs for various faith groups of inmates in the Department's facilities and coordinate the provisions of volunteer services. I provide direction and consultation to Central Office and institutional staff regarding the legitimacy of various religions and religious practices. I conduct annual audits of all religious programs and services provided in the Department of Corrections. I insure that reasonable religious accommodations are developed for all state correctional facilities. I also research religions in order to determine the applicability of requests for the establishment of those religions in the Department's facilities. I recommend policies and procedures concerning the content and goal of religious programs and volunteer services.

3. To the extent that any inmate who professes a belief in al-Islam, and who asserts said belief as an exemption from any non-Muslim secular programs, such behavior is purely a subjective conclusion of the requirements of the Muslim faith. The Islamic faith does not discourage secular educational programs. On the contrary, pursuing knowledge is given obligatory importance in the Islamic tradition.

4. The treatment programs offered in correctional institutions, including Batterers Intervention, Stress and Anger Management, Citizenship and Long-Term Offenders are secular programs and are designed to assist inmates in becoming mature law abiding citizens. They do not proscribe any particular manner of worship or enforce the tenets of any particular religious belief.

5. Inmates are afforded many opportunities to practice their faith while incarcerated. By the same token, however, it simply cannot be said that any free exercise of religion gives an inmate the authority to disavow mandated treatment programs of the Department of Corrections designed to assist in the rehabilitation of offenders.

6. This statement and declaration is made subject to the penalties of 28 U.S.C. § 1746 relating to unsworn declarations under penalty of perjury, which provides that if I make knowingly false averments, I may be subject to criminal penalties.



Rev. Ulrich H. Klemm

Date: March 8, 2007